

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,)	No. _____
)	
Plaintiff,)	
)	
v.)	18 U.S.C. § 1028(a)(7) and (f)
)	(Identity Theft Conspiracy)
)	NMT: 20Years Imprisonment
AMANDA J. DRAKE,)	NMT: 3 Year Supervised Release
[DOB: 11/21/1979])	NMT: \$250,000 Fine
)	Class C Felony
and)	
)	\$100 Mandatory Special Assessment
JAMES B. DRAKE)	
[DOB: 10/04/1963])	
)	
Defendants .)	

INDICTMENT

THE GRAND JURY CHARGES THAT:

On or about between May 2009, and continuing through the date of this Indictment, in the Western District of Missouri, AMANDA J. DRAKE and JAMES B. DRAKE, defendants herein, did knowingly and intentionally combine, conspire and agree with each other to commit offenses against the United States, that is, identity theft, in that, defendants did knowingly possess and use in or affecting interstate or foreign commerce, without lawful authority, a means of identification of other persons, to wit, a University of Central Missouri student enrollment list, which included names, social security numbers and dates of birth, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a felony under any applicable state or local

law, to wit, fraudulent use of a credit device, in violation of Missouri Revised Statutes Section 570.130.

All in violation of Title 18 U.S.C. § 1028(a)(7) and (f)

A TRUE BILL.

8/11/09

DATE

/s/ Christopher Stansbury

FOREPERSON OF THE GRAND JURY

/s/ William L. Meiners

William L. Meiners, #28263

Assistant United States Attorney